

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

STATE OF TEXAS, *et al.*, §  
§  
Plaintiffs, §  
§  
v. §  
§  
UNITED STATES OF AMERICA, *et al.*, § Case No. 1:18-CV-68  
§  
Defendants, §  
§  
and §  
§  
KARLA PEREZ, *et al.* §  
§  
Defendant Intervenors. §

**UNOPPOSED MOTION FOR LEAVE TO JOIN BRIEF OF *AMICI CURIAE* IN  
OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 7 and Local Civil Rule 7, the American Business Immigration Coalition, Ascension Texas, the Dallas Regional Chamber, the Dallas Hispanic Chamber of Commerce, the Irving-Las Colinas Chamber of Commerce, Health Management Systems, the National Association for Latino Community Asset Builders, the San Antonio Chamber of Commerce, the Texas Opportunity Roundtable, the Texas Restaurant Association, and VisitDallas file this Unopposed Motion for Leave to Join Brief of *Amici Curiae* in Opposition to Plaintiffs' Motion for Preliminary Injunction, and would respectfully show the Court as follows:

1. On July 24, 2018 (*see* Dkt. 244), this Court granted the Motion of *Amici Curiae* ("Amici") the Houston Hispanic Chamber of Commerce, the Texas Association of Business, six other Texas Chambers of Commerce, the Texas Border Coalition, International Bancshares Corporation, Marek Brothers Construction, Inc., Southwest Airlines and United Airlines for

Leave to File a Brief of *Amici Curiae* (Dkt. 221-1, the “Amicus Brief”) in Opposition to Plaintiffs’ Motion for a Preliminary Injunction.

2. Since that time, *Amici* have been contacted by other similarly-situated Chambers of Commerce, business associations, and companies who wish to adopt and join the Amicus Brief in its entirety (the “Proposed *Amici*”):

3. The **American Business Immigration Coalition** (“ABIC”) represents businesses across the country in promoting federal immigration reform. The coalition represents small businesses and large corporations on a basis of sustaining global competitiveness through a stable and unified economic system. ABIC aims to promote a process of legal employment for immigrants, so American businesses can leverage immigrants’ talents to grow and succeed. ABIC recognizes that Dreamers are the hardworking innovators that the country needs in order to continue to grow the economy and remain competitive globally. Fortune 500 companies and small business owners alike rely on their Dreamer employees every day, and many Dreamers have launched businesses that employ native-born American citizens. Just as the country invested in their education, Dreamers have in turn invested in the economy by purchasing cars and homes, and paying an estimated \$1.7 billion in state and local taxes annually. Dreamers have proven themselves to be assets to the country, and it is imperative that Dreamers are able to continue to work and contribute to the economy.

4. **Ascension Texas.** Seton Healthcare Family and Dell Children’s Medical Center in Austin, Texas and Providence Healthcare Network in Waco, Texas make up the Ascension Texas health ministry for Ascension, the largest nonprofit health system in the U.S. and the world’s largest Catholic health system. With 12 hospitals, more than 12,500 employees and more than 3,000 credentialed physicians, Ascension Texas serves more than 2 million people across 50 counties each year. Ascension Texas’s Mission calls it to advocate for a compassionate and just

society for all. In Texas, at least 50 of its associates – almost all of whom are doctors, nurses and clinical support staff – are potential candidates for deferred action under DACA. Within Ascension’s national network, 74 percent of approximately 500 associates eligible for deferred action under DACA are clinical personnel interacting with patients every day. Ending DACA would negatively impact this community by depriving patients of clinicians whom they have come to know and trust.

5. The **Dallas Regional Chamber** (“DRC”) is the leading membership-driven business organization in North Texas. Founded in 1909, DRC is comprised of more than 1,100 member companies representing more than 500,000 employees, and has become the voice of business and the champion for economic growth in the region. The DRC represents businesses of all sizes and is focused on leading economic development and growth, driving improvements in public education to strengthen the workforce and provide lifetime opportunities, and influencing public policy to ensure that the Dallas Region is the number one community in the U.S. to live, work, and do business. The DRC is keenly aware that the Texas economy relies on – and benefits greatly from – the economic and productivity contributions of all workers, including Dreamers. DRC recognizes and supports the important contributions of North Texas Dreamers to the productivity and economy of the Dallas Region.

6. The **Greater Dallas Hispanic Chamber of Commerce** (“GDHCC”) was established in 1939 to advocate for Hispanic-owned businesses in the Greater Dallas area. Its mission is to grow and support the Hispanic business community in North Texas. GDHCC has over 2,000 members which range in size from start-ups to multi-national corporations including a variety of industries: food and beverage, financial services, media, energy, health care and manufacturing. Through its media partners and platforms, the GDHCC has the ability to reach Dallas-Fort Worth’s Metropolitan Statistical Area (MSA) which, as of the 2017 Census data, has

7.4 million residents. The GDHCC is in support of Dreamers. The GDHCC knows that Dreamers play a critical role in the economic stability and sustainability of the North Texas region, of Texas and of the United States. Therefore, it supports grants of deferred action, as well as permanent protections to enable young immigrants in local communities and across the country to continue to pursue their education, contribute to the labor force, continue to contribute to the tax base, and start new businesses that create jobs.

7. The **Irving-Las Colinas Chamber of Commerce** represents more than 1,900 businesses. The Chamber has been asked by its member-investors to take a position supporting DACA as Dreamers have become a vital part of the community and the economy. As it continues to serve as the key voice of business, it is critical that the Chamber be part of the effort eliminating road blocks and enabling these individuals to work.

8. **Health Management Systems** (“HMS”) advances the healthcare system by helping payers reduce costs and improve health outcomes. Through its industry-leading technology, analytics and engagement solutions, HMS saves billions of dollars annually for healthcare payers, government programs and other at-risk-organizations, while helping people live healthier lives. HMS serves more than 40 states, 300 health plans and the federal government, as well as hundreds of employers. HMS is based in Irving, Texas, employing 1,300 Texans and another 1,200 people across the nation. Dreamers form an important part of Texas’s talent pool. Employers across the state count on Dreamers to drive strategy, innovate and help their businesses grow. Protecting DACA is the right thing to do—morally and economically.

9. The **National Association for Latino Community Asset Builders** (“NALCAB”) represents and serves a geographically and ethnically diverse group of 120+ non-profit organizations that are economic engines in the nation’s Latino communities. Members of the NALCAB Network are real estate developers, business lenders, economic development

corporations, credit unions, and consumer counseling agencies, operating in 40 states and DC. NALCAB is headquartered in San Antonio and has offices in Washington, DC.

10. The **San Antonio Chamber of Commerce** (“SACC”), founded in 1894, is the leading business organization in San Antonio and the surrounding region. The SACC mission is to propel business success by advocating for the needs of its 2,100 business members who together employ 500,000 in the San Antonio area. A major challenge to the continuation of that success falls squarely in the area of workforce development. Through its efforts to enhance the business climate, SACC is working with various community partners to develop and amplify diverse pipelines of qualified employees throughout the employment spectrum. Young immigrants who have been granted deferred action under DACA in the San Antonio MSA have been contributing to the community by creating jobs and building the tax base. These individuals are, therefore, an integral component to existing and future employment solutions. Ending DACA would not only negatively impact these individuals, it would cost Texas more than \$6 billion in annual GDP losses. The continuation of DACA is, therefore, necessary to safeguard San Antonio’s growing economy and preserve the Texas Miracle.

11. The **Texas Opportunity Roundtable** (“TOR”) is a growing coalition of local business leaders, employers and business associations with long-standing relationships in the state of Texas who are committed to promoting common sense immigration reform and ensuring state leaders understand the profoundly negative impact anti-immigrant legislation could pose to the state of Texas. TOR recognizes that its members and employers rely on the Dreamers residing and working in Texas every day to run and grow their businesses. Just as the state has invested in Dreamers’ education, they have in turn invested in the state’s economy by purchasing cars and homes, founding businesses that create jobs for Americans, and paying an estimated hundreds of millions in state and local taxes annually in Texas alone. Dreamers have proven

themselves to be assets to the state and country, and it is imperative that Dreamers are able to continue to work and contribute to the Texas economy.

12. The **Texas Restaurant Association** represents the Texas foodservice industry, which employs 12% of the state's workforce. The TRA aims to improve the workplace environment in Texas by providing benefits and support to workers in the industry. Additionally, the TRA's philanthropic arm, the Texas Restaurant Association Education Foundation, endeavors to advance the future of the Texas foodservice industry through educational programs.

13. **VisitDallas** is the city's sales and marketing team working to promote Dallas as the ideal visitor and convention destination in Texas. VisitDallas connects with people throughout the United States and destinations around the globe, inviting them to discover this great city. In 2017, 27.2 million people visited Dallas, supporting 61,000 local jobs and spending \$4.7 billion, generating a total economic impact of \$8 billion. In 2018, Cvent ranks Dallas as #6 among the top-50 U.S. cities for meetings and conventions. North Texas has the third largest population of Dreamers in the United States. Undoubtedly, many of these Dreamers hold jobs as front-line staff in the hospitality industry, thus directly affecting the industry and growth.

14. As members of the Texas business community, Proposed *Amici* and their members have also been witnesses to, and beneficiaries of, the many contributions these Dreamers have made to the Texas economy. Proposed *Amici* wish to adopt and join in the Amicus Brief in its entirety because they agree with its analysis and its conclusions about the detrimental impact that Plaintiffs' requested preliminary injunction would have on Texas businesses, and the Texas economy as a whole.

15. No party made any monetary contribution toward this application.

16. Pursuant to Local Rule 7, *Amici*'s counsel has conferred with counsel for the parties, who indicated that the Plaintiff States consent to and the remaining parties do not oppose this Motion. A proposed order is attached.

**PRAYER**

WHEREFORE, the American Business Immigration Coalition, Ascension Texas, the Dallas Regional Chamber, the Dallas Hispanic Chamber of Commerce, the Irving-Las Colinas Chamber of Commerce, Health Management Systems, the National Association for Latino Community Asset Builders, the San Antonio Chamber of Commerce, the Texas Opportunity Roundtable, the Texas Restaurant Association, and VisitDallas respectfully pray that this Court **GRANT** this Unopposed Motion for Leave to Join Brief of *Amici Curiae*, **ORDER** that the Proposed *Amici* are hereby granted leave to join the Amicus Brief, and **GRANT** *Amici Curiae* all relief to which they may be justly entitled.

Respectfully submitted,

/s/ Thomas S. Leatherbury  
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**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Proposed *Amici* conferred by email on July 27, 30 and August 1, 2018 with Todd Disher, counsel for Plaintiffs State of Texas, *et al.* Counsel for Proposed *Amici* further conferred by email and by telephone on July 27, 2018, with Jeffrey Robins, counsel for Defendants United States of America, *et al.*; and Fatima Menendez, counsel for Defendant Intervenors Karla Perez, *et al.* by email on July 31, 2018. Plaintiffs do not oppose the requested relief. Defendants do not oppose the requested relief. Defendant Intervenors do not oppose the requested relief.

/s/ Thomas S. Leatherbury

Thomas S. Leatherbury

**CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2018, I caused a true and accurate copy of the foregoing document to be served on all counsel of record via filing of the same with the Court's CM/ECF system.

/s/ *Thomas S. Leatherbury*  
Thomas S. Leatherbury

UNITED STATES DISTRICT COURT  
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**[PROPOSED] ORDER GRANTING UNOPPOSED MOTION FOR LEAVE TO JOIN  
BRIEF OF *AMICI CURIAE* IN OPPOSITION TO PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

On this day came on for consideration the Unopposed Motion for Leave to Join Brief of *Amici Curiae* (“the Motion”), by the American Business Immigration Coalition, Ascension Texas, the Dallas Regional Chamber, the Dallas Hispanic Chamber of Commerce, the Irving-Las Colinas Chamber of Commerce, Health Management Systems, the National Association for Latino Community Asset Builders, the San Antonio Chamber of Commerce, the Texas Opportunity Roundtable, the Texas Restaurant Association, and VisitDallas. The Court, having reviewed and considered the Motion and any related response, is of the opinion that the Motion should be **GRANTED**.

**IT IS THEREFORE ORDERED** that the Motion is hereby **GRANTED**.

SIGNED this, the \_\_\_\_\_ day of \_\_\_\_\_, 2018.

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THE HONORABLE ANDREW S. HANEN  
UNITED STATES DISTRICT JUDGE